

JUL - 2 1993

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

93-61

PR Docket No. 93-5
RM-8013

**COMMENTS OF AMTECH CORPORATION IN SUPPORT
OF MOTION FOR EXTENSION OF TIME**

On June 29, 1993, over 70 parties, including AMTECH, filed comments in response to the *Notice*. AVM commenters included proponents of both wide-area and local-area AVM systems, of sharing among wide-area systems, of wide-area system

No. of Copies rec'd
List A B C D E

exclusivity, of modifications to the FCC's band plan, and of the grandfathering of local-area system licensees in certain parts of the 902-928 MHz band. A number of technical and economic analyses were provided in the comments that will require close examination before a meaningful response can be formulated. In addition to the comments submitted by AVM interests, numerous other users and would-be users of the band filed comments including amateur radio operators and organizations, manufacturers and users of Part 15 devices, and the major advocate of wind profiler radar systems at 915 MHz.

Amtech agrees with the Part 15 Coalition that a fifteen-day reply cycle is inadequate to complete and submit replies in this proceeding, particularly given the number of participants, the timing of the reply date, and the nature and importance of the proceeding.

First, the sheer volume of comments -- totalling over 70 -- warrants an extension.

Second, this rulemaking involves a number of technically complex issues that go to the heart of an entire industry's future and the degree to which Intelligent-Vehicle Highway Systems become a reality, as the Commission itself has observed. *Notice*, 8 F.C.C. Rcd at 2503. The comments present a diverse array of responses to those issues, including a number of counterproposals to the proposed rules set forth in the *Notice*. The multitude of proposals made in this proceeding by the commenters

requires careful thought and precise technical analysis to respond in a meaningful way. Considerably more time than two weeks is necessary to accomplish the task at hand.

Third, the Fourth of July holiday falls directly between the comment and reply date, making it difficult to expedite review and analysis of the comments, as is dictated by the short reply cycle. Moreover, reply comments in the Commission's inquiry proceeding regarding the operation of wind profiler radar systems at 915 MHz are due on July 15, 1993, just one day after replies in this matter.¹ Many of the parties interested in the inquiry proceeding also are participating in Docket 93-61. Additionally, AMTECH understands that the reply date in the refarming proceeding has now been set as July 30. Many of the same parties and counsel working on issues in the refarming proceeding will also be involved in the AVM proceeding.

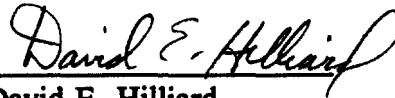
In conclusion, in light of the diversity and volume of comments, the technical nature and complexity of the issues raised in the initial submissions to the Commission, and the timing of the reply date and, perhaps most importantly, the fundamental importance of this proceeding to the future development of the AVM industry, Amtech submits that grant of the Part 15 Coalition Motion for Extension of Time is both warranted and in the public interest.

¹ See Amendment of Section 2.106 of the Commission's Rules to Allocate Spectrum for Wind Profilers Radar Systems, Docket 93-59, 8 FCC Rcd 2546 (1993) ("Notice of Proposed Rule Making and Notice of Inquiry").

THEREFORE, Amtech supports the Part 15 Coalition's Motion for Extension of Time and requests the Commission to extend the date for Reply Comments in PR Docket 93-61 until August 15, 1993.

Respectfully submitted,

AMTECH CORPORATION



David E. Hilliard
Edward A. Yorkgitis, Jr.
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.c. 20006
(202) 429-7000

Its Attorneys

July 2, 1993